

Slavin & Slavin, Esqs.

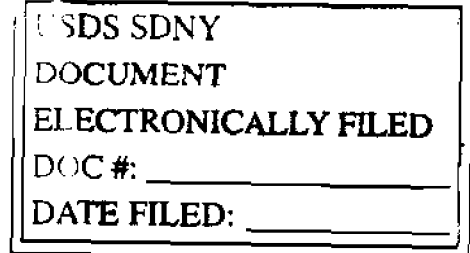
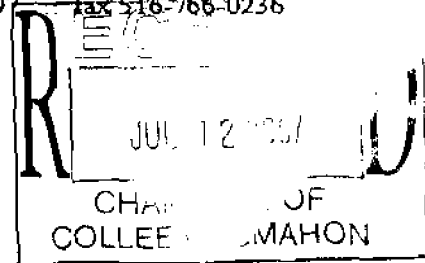
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MEMO ENDORSED

July 12, 2007

The Honorable Colleen McMahon
 United States District Judge
 Southern District of New York, Daniel P. Moynihan Courthouse
 500 Pearl Street, chambers 640
 New York, New York 10007
 Telephone 212-805-6325 :: Facsimile 212-805-6326

Re: Aaron Stern vs. Morris Doug Jaffee
 Docket number 04CIV 08242



Dear Judge McMahon:

We represent Plaintiff, Aaron Stern. I write to advise the Court of the status of the parties Joint Pretrial Order and to correct an impression that may have been given by the letter of Defense Counsel sent to Chambers earlier today.

The Joint Pretrial Order was to be served and filed on July 13, 2007. The date had previously been extended to allow Counsel time to negotiate the matter and if not resolved to have sufficient time to exchange drafts of the Order.

Yesterday in a telephone call with Mr. Engle the Defense Counsel made their first offer of settlement. Such was inadequate. → Then you should not have waited to start work -

Defense Counsel issued their portion of the Order earlier today. As such, neither I nor Howard Engle, Esq., (my co-counsel) will have time to review Defense Counsel's proposal and to prepare and then issue our portion of the anticipated non-disputed Pretrial Order by tomorrow.

Based upon the situation presented, it is requested that the Court allow a two (2) week extension in this matter. Plaintiff will prepare and issue to Defense Counsel by July 17, 2007 our portion of the Pretrial Order. Counsel will then be able to respond to such by July 20th. Plaintiff and Defendant can then finalize the Pretrial Order for submission to Chambers by July 27, 2007.

As such, the Parties respectfully request that the Court kindly consider this request for extension that the papers can be properly completed.

Respectfully submitted,

Barton L. Slavin

BLS:kk

cc:

Capricci Bilandal-Barush, Esq., via fax 212-884-8538 (Attorney for Defendant)

Howard Engle, Esq., via fax 212-385-2061

until 2 days before the due date, I was LIES to about the parties' interest in negotiating NO EXTENSION - GET IT DONE